

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ALEXANDER STROSS,

Plaintiff,

Case No. 1:15-cv-00223-SS

v.

REDFIN CORPORATION,

Defendant/Counterclaimant.

DECLARATION OF ANA MARIA G. GARNIER

I, Ana Maria G. Garnier, do hereby affirm and declare as follows:

1. My name is Ana Maria G. Garnier. I am a Paralegal at Foster Pepper, PLLC. I am over 18 years of age, have personal knowledge of the facts stated in this declaration, and am competent to testify to them.

2. I submit this declaration to identify the evidentiary sources of the information in Redfin's Exhibit A which is attached hereto.

3. Column A ("SJ #") corresponds to the sequential order of the Redfin property listings identified by Plaintiff Alexander Stross ("Stross") in Exhibit A to Stross' First Amended Complaint (Dk. No. 55). Column B corresponds to the sequence number (hereinafter "FAC Sequence") provided by Plaintiff Alexander Stross ("Stross") in Column A, in Exhibit A to Stross' First Amended Complaint (Dk. No. 55). Redfin Exhibit A, Column C contains the URL of each property that Stross identified in Column B in Exhibit A to Stross' First Amended Complaint. The URL contains both the property address and the unique numeric identifier that Redfin assigns to each property (the "Redfin Property ID"). Redfin Exhibit A, Column I contains each and every Copyright Registration number Stross has identified for the photographs he

claims have been infringed by Redfin and this corresponds to Column J in Exhibit A to Stross' First Amended Complaint ("Registration number"). The information in these columns accurately reflects the information that Stross provided Redfin.

4. Redfin Exhibit A, Column D contains the property address extracted from the URL in Column C.

5. Redfin Exhibit A, Column E contains the Redfin Property ID extracted from the URL in Column C.

6. Stross produced screenshots of Redfin's website and his Pinterest account. These screenshots list the MLS Listing ID for each asserted property. I compared the Redfin Property ID and address to the corresponding screenshot to determine which MLS Listing ID is associated with the listings that included Stross' photographs. Redfin Exhibit A, Column F accurately reflects the MLS Listing ID for each asserted property as provided by the screenshots Stross provided.

7. Stross provided the registration certificates for each Copyright Registration. The registration certificates provided the effective date of the registration. Stross provided email confirmation from the U.S. Copyright Office confirming the date he submitted the deposit copies to the Copyright Office. I used this date for the effective date of the application numbers. For VA0001808620, Stross did not provide the Registration Certificate. I used the email confirmation from the U.S. Copyright Office as the effective date for this registration. The effective dates of registration for the asserted properties are accurately reflected in Redfin Exhibit A, Column J.

8. Also attached to this declaration are Exhibit A-1 and Exhibit A-2, which are selected columns and rows from the Exhibit A spreadsheet.

9. Attached hereto as Exhibit B are true and correct copies of deposition excerpts from the April 20, 2016 deposition of Alexander Stross.

10. Attached hereto as Exhibit C are true and correct copies of deposition excerpts from the April 29, 2016 deposition of Glenn Kelman.

11. Attached hereto as Exhibit D are true and correct copies of deposition excerpts from the May 4, 2016 deposition of Jason Aleem as Corporate Representative of Redfin Corporation

12. Attached hereto as Exhibit E are true and correct copies of deposition excerpts from the May 2, 2016 deposition of Chris Long.

13. Attached hereto as Exhibit F are true and correct copies of deposition excerpts from the May 3, 2016 deposition of Kenneth Doocy.

14. Attached hereto as Exhibit G are true and correct copies of deposition excerpts from the May 3, 2016 deposition of Jacquelyn Krennek.

15. Attached hereto as Exhibit H are true and correct copies of deposition excerpts from the May 3, 2016 deposition of Jon Luce.

16. Attached hereto as Exhibit I are true and correct copies of deposition excerpts from the May 12, 2016 deposition of Jennifer Mehis.

17. Attached hereto as Exhibit J is a true and correct copy of Plaintiff's August 4, 2015 Response to Redfin Corporation's First Set of Interrogatories with Exhibits A and B attached.

I declare under penalty of perjury under the laws of the State of Texas that the foregoing is true and correct.

Executed this 24th day of June, 2016 at Seattle, Washington.


ANA MARIA G. GARNIER